

**Torres, Francine**

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**From:** kyoungd1@yahoo.com%inter2 [kyoungd1@yahoo.com] on behalf of kyoungd1@yahoo.com  
**Sent:** Tuesday, February 22, 2005 6:56 PM  
**To:** Torres, Francine  
**Subject:** RE: Approve Ferric Phosphate for Organic Farming

Kenneth Youngdale  
10296 Cerveza Dr.  
Escondido, CA 92026

To: Francine Torres  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave., SW  
Room 4008-So, Ag Stop 0268  
Washington, DC 20250-0200

Re: Approve Ferric Phosphate for use in organic farming.

Date of Review: February 28th March 3, 2005

As an organic grower I'm encouraging you to approve Ferric Phosphate for inclusion on the National List and use in organic farming. I am against the two TAP reviewers recommendations of not allowing Ferric Phosphate for use as a molluscicide. Ferric Phosphate occurs naturally in soil and has no known harmful effects on other organisms. Current organically approved methods cited as alternatives are not practical for organic farming.

We operate an organic Grapefruit farm of 5 acres in Escondido, California. Slugs and snails are a major pest on my/our farm. Economic losses from slug/snail damage are often in excess of \$500 an acre in a given year.

Currently, there are no effective organically approved slug/snail control methods. Other methods such as copper banding, trapping, decoy plantings or diatomaceous earth are neither practical nor effective on a production farm this acreage and do not significantly reduce slug/snail damage within the field. I/we do not use these methods on our farm.

Organic growers need to have effective tools at our disposal. Lack of an organic slug and snail bait costs us money every year. Please ensure that ferric phosphate is approved for use as a molluscicide in organic farming.

Sincerely,  
Kenneth Youngdale  
Cerveza Dr. Growers Coop

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